JACKSON LEWIS P.C. 200 Connell Drive Suite 2000 Berkeley Heights, NJ 07922 (908) 795-5200 ATTORNEYS FOR DEFENDANTS

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

TIHO MARINAC,

Plaintiff,

Civil Action No. 1:19-cv-07225-DLC

VS.

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CIVIL ACTION

MONDELĒZ INTERNATIONAL, INC., MONDELĒZ INTERNATIONAL HOLDINGS, LLC, and MondelĒz Global LLC,

RULE 502(D) ORDER

Defendants.

The production of privileged or work-product protected documents, electronically stored information ("ESI") or other information, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).

Nothing contained herein is intended to or shall serve to limit a party's right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness and/or segregation of privileged and/or protected information before production.

SO ORDERED.

DENISE COTE

United \$tates District Judge

Dated: March 20, 2020

4829-9164-4087, v. 1